

1 STEPHEN R. HARRIS, ESQ. NVB 1463
2 Email: steve@harrislawreno.com
3 NORMA GUARIGLIA, ESQ. NVB 16244
4 Email: norma@harrislawreno.com
5 HARRIS LAW PRACTICE LLC
6 850 E. Patriot Blvd., Suite F
Reno, NV 89511
Telephone: (775) 786-7600
Administrative Creditor
(Former Counsel for Debtors)

7
8 UNITED STATES BANKRUPTCY COURT
9 FOR THE DISTRICT OF NEVADA

10 * * * * *

11 Case No. 21-14978-abl
(Chapter 11)

12 IN RE:

13 SILVER STATE BROADCASTING, LLC

14 AFFECTS THIS DEBTOR

15 AFFECTS GOLDEN STATE
BROADCASTING, LLC

16 AFFECTS MAJOR MARKET RADIO
LLC

17 AFFECTS ALL DEBTORS

Jointly Administered with:

21-14979-abl	Golden State Broadcasting, LLC
21-14980-abl	Major Market Radio LLC

NOTICE OF HEARING

Hearing Date: November 29, 2023

Hearing Time: 1:30 p.m.

Est. Time: 30 minutes

Set by: Calendar Clerk

21 NOTICE IS HEREBY GIVEN that on October 24, 2023, Administrative creditor,
22 HARRIS LAW PRACTICE LLC (“HLP”), former general bankruptcy counsel for jointly
23 administered Debtors SILVER STATE BROADCASTING, LLC, GOLDEN STATE
24 BROADCASTING, LLC, and MAJOR MARKET RADIO LLC (collectively “Debtors”), filed
25 its *Motion for Order Removing Chapter 11 Trustee* [ECF No. 839] (“Motion”).

26 The Motion seeks an Order removing the chapter 11 trustee, Michael Carmel, for the
27 reasons set forth in the Motion pursuant to 11 U.S.C. §§ 105, 324, and 1105 and restoring the
28 Debtors into possession under 11 U.S.C. § 1105, or alternatively, directing the United States

1 Trustee to appoint a new, qualified, neutral, and impartial trustee for these cases.

2 Any Opposition must be filed pursuant to Local Rule 9014(d)(1).

3 Local Rule 9014(d)(1): "Except as set out in subsection (3) below,
4 any opposition to a motion must be filed, and service of the
5 opposition must be completed on the movant, no later than fourteen
6 (14) days preceding the hearing date for the motion. The opposition
7 must set forth all relevant facts and any relevant legal authority. An
8 opposition must be supported by affidavits or declarations that
9 conform to the provisions of subsection (c) of this rule.

10 If an objection or opposition is not timely filed and served, the relief requested may be
11 granted without a hearing.

12 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
13 with the court. You *must* also serve your written response on the person who sent you this
14 notice.

15 If you do not file a written response with the court, or if you do not serve your written
16 response on the person who sent you this notice, then:

- 17 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 18 • The court may *rule against you* without formally calling the matter at the hearing.

19 Written requests for copies of the subject Motion can be mailed, faxed, or emailed to
20 Harris Law Practice LLC, Attn: Norma Guariglia, at 850 E. Patriot Blvd, Suite F, Reno, NV
21 89511, Fax 775-786-7764, or norma@harrislawreno.com.

22 NOTICE IS FURTHER GIVEN that a hearing on the Motion will be held on **November
23 29, 2023, at 1:30 p.m.**, by remote participation before a United States Bankruptcy Judge in the
24 United States Bankruptcy Court. **The remote participation telephone conference line is (669)
25 254-5252; Meeting ID 161 110 6049; Passcode 154251#.** Remote participation information may
also be found on the posted calendar on the Court's website at
<https://www.nvb.uscourts.gov/calendars/court-calendars/>.

26 DATED October 25, 2023.

27 HARRIS LAW PRACTICE LLC

28 /s/ *Norma Guariglia*

NORMA GUARIGLIA, ESQ.
Administrative Creditor